

| Sr. No | Date of order/ proceedings | Order or other proceedings with signature of Judge or Magistrate |
|--------|----------------------------|--|
| 1 | 2 | 3 |
| | 05.07.2018 | <p style="text-align: center;"><u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</u> <u>At Camp Court Swat</u></p> <p style="text-align: center;">Appeal No. 564/2016</p> <p style="text-align: right;">Date of Institution ... 16.05.2016 Date of Decision ... 05.07.2018</p> <p>Fazal Khaliq son of Yar Dula Khan resident of Sayaree Payan Talash, tehsil Timergara, District Dir Lower. Appellant</p> <p>1. Inspector General of Police, Khyber Pakhtunkhwa. 2. D.I.G, Malakand Region Saidu Sharif Swat. 3. D.P.O, Lower Dir. 4. S.P FRP Malakand Division at Swat.</p> <p style="text-align: right;">Respondents</p> <p>Mr. Sajjad Ahmad Jan Advocate-----For Appellant</p> <p>Mr. Usman Ghani District Attorney-----For Respondents</p> <p>Mr. Subhan Sher Chairman Mr. Muhammad Hamid Mughal Member</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>MUHAMMAD HAMID MUGHAL, MEMBER:</u> Appellant</p> <p>with counsel present. Mr. Usman Ghani learned District Attorney for the respondents present.</p> <p>2. Learned counsel for the appellant stated that the appellant has filed the present service appeal against the order dated 21.02.2009 whereby he was removed from service on the ground that he deserted the force during the emergency and against the order dated</p> |

04.01.2011 vide which the departmental appeal of the appellant was rejected; that the appellant has also challenged the order dated 08.12.2015 of the Review Board whereby departmental appeal/revision filed by the appellant was rejected. Learned counsel for the appellant argued that the appellant could not attend to his duties for a few months due to circumstances beyond his control as the father of the appellant was seriously ill. Learned counsel for the appellant argued that the appellant was met with discriminatory treatment as some of the colleagues of the appellant who were also dismissed/removed under similar circumstance were reinstated either by the Appellate Authority or by the Review Board. Further argued that original impugned order of punishment of removal was also awarded to the appellant with retrospective effect hence being a retrospective punishment the original impugned order is a void order and no limitation runs against the same. Learned counsel for the appellant in support of his contention regarding discriminatory treatment submitted copies of reinstatement order of F.C Muhammad Yar No.2118, Constable Noor khan No.462, Constable Jawad Hassan No.2111, Constable Atta Ullah No. 2240, Constable Waheed Khan No.4886 of FRP, Constable Muhammad Shahid 4890 of FRP etc

3. As against learned District Attorney resisted the present service appeal and defended the impugned orders on the ground mentioned therein.

4. Arguments heard. File perused.

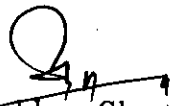
5. Admittedly the impugned punishment of removal from

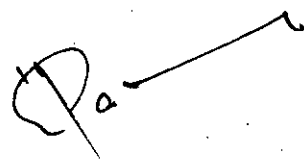
service was imposed upon the appellant with retrospective effect hence the original order of removal from service is void and no limitation would run against the same.

6. Learned District Attorney remained unable to rebut the contention of the learned counsel for the appellant that many other colleagues of the appellant who were also dismissed/removed from service on the ground of absence from duty were reinstated either by the Appellate Authority or by the Review Board. In the stated circumstances of the case vis a vis alleged discriminatory treatment, the order dated 04.01.2011 of the Appellate Authority and the order dated 08.12.2015 of the Review Board are hereby set aside. Resultantly the departmental appeal of the appellant shall be deemed pending. Appellate Authority is directed to decide the same afresh with speaking order within a period of three (03) months of the receipt of this judgment. The present service appeal is disposed off accordingly. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

05.07.2018

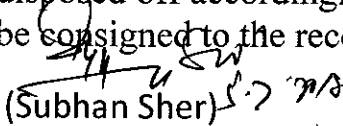

(Subhan Sher)
Chairman


(MUHAMMAD HAMID MUGHAL)
MEMBER

05.07.2018

Appellant with counsel present. Mr. Usman Ghani learned District Attorney for the respondents present.

Vide separate judgment of today of this Tribunal placed on file, the order dated 04.01.2011 of the Appellate Authority and the order dated 08.12.2015 of the Review Board are hereby set aside. Resultantly the departmental appeal of the appellant shall be deemed pending. Appellate Authority ~~is directed~~ is directed to decide the same afresh with speaking order within a period of three (03) months of the receipt of this judgment. The present service appeal is disposed off accordingly. Parties are left to bear their own costs. File be consigned to the record room.


(Subhan Sher)
Chairman


(Muhammad Hamid Mughal)
Member

ANNOUNCED

05.07.2018

04.07.2018

Appellant Fazal Khaliq in person alongwith his counsel Mr. Sajjad Ahmad Khan, Advocate. Mr. Hazrat Hussain, Inspector on behalf of the respondents alongwith Mr. Usman Ghani, District Attorney present. Arguments heard. Case to come up for order tomorrow i.e. on 05.07.2018 before this D.B at camp court, Swat.


Member

Chairman
Camp court, Swat.

05.07.2018

~~with counsel present, Mr. Usman Ghani, learned District Attorney, for the respondents present.~~

~~Wide separate judgment of the Board and hereby set aside. The appellant shall be directed to decide the matter within a period of three (3) months. Costs of the proceedings shall be borne by the appellant.~~

~~(Signature)
Chairman~~


~~(Signature)
Member~~

~~05.07.2018~~

Service Appeal No. 564/2016

04.04.2018

Appellant with counsel and Mr. Usman Ghani, District Attorney alongwith Hazrat Hussain, Inspector for the respondents present. Learned counsel for the appellant instead of amending the memorandum of appeal filed an application for correction of date in prayer as well as in para-5 of the memorandum of appeal, which was a clerical mistake. The said application is accepted. Clerical mistake of correction be made accordingly. The learned counsel for the appellant also submitted an application for placing certain documents on file, which is also allowed. To come up for arguments on 06.06.2018 before the D.B at Camp Court, Swat.



Chairman
Camp court, Swat

06.06.2018

Appellant Rahimud Din in person alongwith counsel Mr. Sajjad Ahmad Jan, Advocate present. M/S Zewar Khan, SI (Legal) and Hazrat Hussain, Inspector alongwith Mr. Usman Ghani, District Attorney for the respondents present. Arguments heard to a great extent.

To come up for record and remaining arguments on 04.07.2018 before the D.B alongwith connected appeal No. 562/2016 at camp court, Swat.


Member


Chairman
Camp Court, Swat

07.11.2017

Appellant with counsel (Sajjad Ahmad Khan, Advocate) present and Fresh Wakalatnama submitted. Mr. Kabir Ullah Khattak, Additional AG alongwith Zewar Khan, SI (Legal) and Muhammad Irshad, SO for the respondents present. Counsel for the appellant seeks adjournment. To come up for arguments on 29.01.2018 at Camp Court Swat.


Member


Chairman
Camp Court, Swat

29.01.2018

Counsel for the appellant present and Addl. AG alongwith Mr. Hazrat Hussain, Inspector for the respondents present. Counsel for the appellant requested for adjournment as he wants to get the memo of appeal amended. To come up for amended memo of appeal on 06.03.2018 before S.B at Camp Court, Swat.

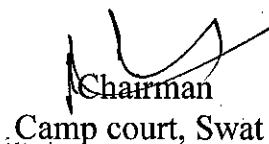

Member


Chairman
Camp Court, Swat

06.03.2018

Appellant in person and Addl. AG alongwith Hazrat Hussain, Inspector (Legal) for the respondents present. Counsel for the appellant seeks further time. To come up for amended memo. Of appeal on 04.04.2018 before S.B at camp court Swat.





Chairman
Camp court, Swat

564/16.

08.12.2016


Appellant in person and Mr. Muqaddar Khan, S.I (Legal) alongwith Mr. Muhammad Zubair, Sr.GP for the respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 06.03.2017 at camp court, Swat.


Chairman
Camp court, Swat

06.03.2017

Appellant in person, Mr. Zewar Khan, S.I (Legal) alongwith Mr. Muhammad Zubair, Senior Government Pleader for the respondents present. Rejoinder submitted. Due to strike of the bar counsel for the appellant is not in attendance. To come up for final hearing on 04.07.2017 before the D.B at camp court, Swat.


Member

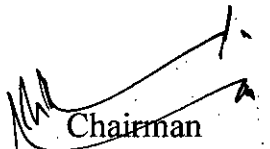

Chairman
Camp court, Swat

04.07.2017

Appellant alongwith counsel and Mr. Muhammad Zubair, District Attorney alongwith Mr. Hazrat Hussain, Head Constable for the respondents present.

Vide our detailed order of today in connected Service Appeal No. 561/2016 this appeal is also adjourned to 07.11.2016 for arguments before D.B at camp court, Swat on the point mentioned in detailed order.


Member


Chairman
Camp Court, Swat



13.7.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as constable when removed from service on the allegations of willful absence vide impugned order dated 20.08.2010 where-against departmental review of the appellant was finally rejected on 13.04.2016 and hence the instant service on 16.05.2016.

That similarly placed other employees were reinstated in service and as such the appellant was discriminated against and not treated in accordance with law. That the enquiry was not conducted in the mode and manners prescribed by law.

Points urged need consideration. Admit subject to limitation. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 08.09.2016 before S.B at camp court Swat.

Appellant Deposited
Security & Process Fee


Chairman
Camp Court, Swat

08.09.2016

Appellant in person and Mian Amir Qadar, GP for the respondents present. Requested for adjournment. To come up for written reply/comments on 08.12.2016 before S.B at camp court, Swat.






Chairman
Camp Court, Swat.

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 564/2016


| S.No. | Date of order Proceedings | Order or other proceedings with signature of judge or Magistrate |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1 | 26/05/2016 | <p>The appeal of Mr. Fazal Khaliq resubmitted today by Mr. Alam Khan Adenzai Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> |
| 2 | 27-5-16 | <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>31-5-16</u></p> <p style="text-align: right;"> CHAIRMAN</p> |
| | 31.05.2016 | <p>None present for the appellant. Notice be issued to counsel for the appellant for preliminary hearing at camp court, Swat on 08.06.2016 before S.B as the same pertains to territorial limits of Malakand Division.</p> <p style="text-align: right;"> Chairman</p> |
| | 08.06.2016 | <p>Appellant in person present. Requested for adjournment. Adjourned for preliminary hearing to 13.07.2016 before S.B at camp court, Swat.</p> <p style="text-align: right;"> CHAIRMAN CAMP COURT, SWAT.</p> |

The appeal of Mr. Fazal Khaliq son of Yar Dula Khan r/o Sarayee Payan Talash Tehsil Termergara Distt. Dir Lower received to-day i.e. on 16.05.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Copy of removal order mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Copies of departmental appeal dated 11.11.2012 and reinstatement order of the colleagues of the appellant mentioned in para-6 of the memo of appeal are not attached with the appeal which may be placed on it.
- 4- Copy of review petition made by the appellant mentioned in para-7 of the appeal is not attached with the appeal which may be placed on it.
- 5- Annexures of the appeal may be annexed serial wise as mentioned in the memo of appeal.
- 6- Annexure-A/2 of the appeal is illegible which may be replaced by legible/better one.
- 7- Copy of rejection order of review petition mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 8- Appeal may be page marked.
- 9- Annexures of the appeal may be attested.
- 10- Annexures of the appeal may be flagged.
- 11- Approved file cover is not used.
- 12- One copy/set of the memorandum of appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 807 /S.T.

Dt. 17/5 /2016


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Alam Khan Adenzai Adv. Pesh.


→ Objection No. 1 Removed.

→ 2, 3, 4. In reply to 2, 3, 4, it is submitted that due to operation of military forces, most of documents were lost including these and the appeal of appellant is based only on Annexure - A to A-2.

→ Objection 5-6 Removed.

→ Objection 7 is attached on page-8, Annexure A.

→ Objection 8 to 12 Removed.


Alam Khan Adenzai
Advocate H.C.

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 564 /2016

Fazal Khaliq **Appellant**

Versus

Inspector General of Police & others..... **Respondents**

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| 4. | Copy of the Orders | "A & A2 | 8-11 |
| 5. | Wakalatnama | | 12 |

Appellant

Through


Alam Khan Adenzai
Advocates High Court

&


Muhammad Hamza
Advocate, Peshawar
Cell No.0333-9279277

Dated 16.05.2016



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BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 564 /2016

G.W.P Province
Service Tribunal
Entry No. 490
Dated 16-5-2016

Fazal Khaliq S/o Yar Dula Khan
R/o Sarayee Payan Talash,
Tehsil Timergara, District Dir Lower **Appellant**

Versus

1. Inspector General of Police,
Khyber Pakhtunkhwa,
2. D.I.G, Malakand Region
Saidu Sharif Swat.
3. D.PO, Lower Dir.
4. S.P FRP Malakand,
Region at Swat.....**Respondents**

**SERVICE APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT
AGAINST THE ORDER DATED 13.04.2016
OF THE AIG ESTABLISHMENT FOR IGP
KHYBER PAKHTUNKHWA, PESHAWAR VIDE
WHICH HE REJECTED APPEAL/REVIEW OF
THE APPELLANT AGAINST DISMISSED
ORDER FROM HIS SERVICE DATED**

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16/5/16

re-submitted to-
and filed;

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Registrar
26/5/16

20.08.2010.

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21-8-2009 // *4/18*

Prayer

By accepting this Appeal impugned order dated 13.04.2016 may please be set aside and the appellant may be reinstated on his service with all back benefits.

Respectfully Sheweth:-

1. That the appellant belongs to Sarayee Payan, Talash, Tehsil Timergara District Dir Lower and was appointed as constable in the FRP Police Malakand Range Swat and was allotted belt No.4868 in the year 2007.
2. That appellant completed his mandatory one year training and joined his duty.
3. That since his appointment i.e. 2007 he performed his duty with devotion deduction and with entire satisfaction of his high-ups and during his four year service no complaint or show cause notice was served upon him.
4. That in the year 2009 the appellant due to serious domestic problem went to home and was busy in the same.

5. That later on appellant came to know that he has been removed from service vide order dated 20.08.2010 SP, FRP Malakand Region at Swat.
- 21.02.2011 - vide order 4/11
6. That on 11.11.2012 the appellant alongwith other official filed Departmental Appeal before SP, FRP Malakand Region at Swat but his appeal was rejected vide order dated 20.08.2010 while some of the colleagues were reinstated into service.
7. That in the year 2015 appellant came to know that some of his colleagues have filed review petition/appeal consequently appellant also field review petition/appeal but once again respondents have made pick and choose and rejected appeal of the appellant vide order dated 13.04.2016 while re-instated some of his colleagues vide order dated 09.09.2015. (Copy of the Orders are attached as annexures "A" & "A2").
8. That appellant preferred to move this Honourable Tribunal through filing of the instant appeal for the following amongst other grounds:

G R O U N D S:

- A. That the appellant has treated un-equally, against the law and thus is deprived of equal protection before the law.

- B. That the Appellant is a trained constable and served the department for more than three years therefore in the interest of police department as well as in the interest of the appellant he may be reinstated into his service.
- C. That many colleagues of the appellant were re-instated into service earlier who filed appeal alongwith the appellant and it is much more important to note here that some of his colleagues are re-instated recently while Review/appeal of the appellant has been rejected. Thus respondent have violated Article 8 and 24 of the Constitution of Islamic republic of Pakistan, 1973.
- D. That appellant is a poor person and the only earning hand of the family therefore he is also entitled to re-instatement.
- E. That as per judgment of the Superior Courts, discrimination in same circumstance is void, and void orders are not sustainable in the eyes of law.
- F. That no opportunity of personal hearing is provided to the appellant till date thus the appellant has condemned unheard.

- G. That Respondents have awarded maximum punishment to the appellant and thus have cause serious miscarriage of justice.
- H. That any other ground will be raise at the time of arguments with the prior permission of this Honourable Tribunal.

It is, therefore most humbly prayed that by accepting this appeal the impugned orders of the respondents may be set aside and the appellant may be re-instated into service alongwith all back benefits.



Appellant

Through


Alam Khan Adenzai
Advocates High Court


Muhammad Hamza
Advocate, Peshawar

Dated 16.05.2016


Meena Qaisar

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2016

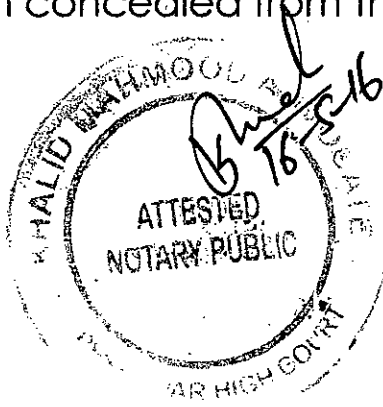
Fazal Khaliq.....**Appellant**

Versus

Inspector General of Police & others.....**Respondents**

AFFIDAVIT

I, Alam Khan Adenzai Advocate High Court, Peshawar as per instructions of my client, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

**BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL,
PESHAWAR**

Service Appeal No. _____/2016

Fazal Khaliq.....Appellant

Versus

Inspector General of Police & others.....Respondents

ADDRESSES OF PARTIES

APPELLANT:

Fazal Khaliq S/o Yar Dula Khan
R/o Sarayee Payan Talash,
Tehsil Timergara, District Dir Lower

RESPONDENTS:

1. Inspector General of Police,
Khyber Pakhtunkhwa,
2. D.I.G, Malakand Region
Saidu Sharif Swat.
3. D.PO, Lower Dir.
4. S.P FRP Malakand,
Region at Swat


Appellant

Through


Alam Khan Adenzai
Advocates High Court

&


Muhammad Hamza
Advocate, Peshawar

Dated 16.05.2016

Better copy

8

Annexure A-3



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR

No. S/ 1775 / 16, dated Peshawar the 25/02/2016.

To The Commandant
Frontier Force Police,
Khyber Pakhtunkhwa Peshawar

Subject: MERCY PETITION FOR RE-INSTATEMENT SERVICE

Memo:

Enclosed please find herewith an application submitted by EX Constable Fajal Khaliq No. 4868 of FRP Molakand Range Swat with the remarks that his 1st petition has already been processed in the Appellate / Review Board held on 20.11.2015 and the competent authority rejected his review petition vide order No. S/58324045 dated 08.12.2015 (copy enclosed). Therefore, his present application cannot be considered as per Rules.

The applicant may please be informed accordingly.

(NAJEEB-UR-REHMAN BAGVD
AG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

ATTESTED TO
BE TRUE

B No

4868

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE
PESHAWAR

No.S/1775/16, dated Peshawar the 25/02/2016

To

The Commandant
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar

Subject: **MERCY PETITION FOR RE-INSTATEMENT IN SERVICE**

Memo

Enclosed please find herewith on application submitted by Ex. Constable Fazal Khaliq No.4868 of FRP Malakand Range Swat with the remarks that his 1st Petition has already been processed in the Apellate/Review Broad held on 20.11.2015 and the competent authority rejected his review petition vide order No.S/5832 -4045 dated 08.12.2015 (Copy enclosed). Therefore, his present application cannot be considered as per Rules.

The applicant may please be informed accordingly

Sd/-
(Najeeb ur Rehman Bagva
AIG/Establishment
For inspector General of Police
Khyber Pakhtunkhwa,
Peshawar

This order shall dispose of the departmental appeal lodged by, Ex- Constable Muhammad Shahid No.4890 of FRP Malakand Range Swat, against the order of SP FRP Malakand Range Swat.

Ex-Constable Muhammad Shahid No.4890 was enlisted as Constable in Police Department on 26.07.2007. He while posted to FRP Lines Timergara District Dir Lower platoon No.86 absented himself from his lawful duty w.e.f.1.09,2008 till his removal from service. He was issued charge sheet and statements of allegation vide Endst: No. 648/EC, dated 30.10.2008, thus issued Final Show Cause Notice vide Endst: No.886/EC, dated 3.01.2009. The Constable was recommended for removal from service by the enquiry committee.

In the light of the recommendation of the enquiry committee and material available on the record the defaulter Constable Muhammad Shahid No.4890 was removed from service vide SP FRP Malakand Range Swat Endst: No.239, dated 21.02.2009. Like some other personnel to the force the appellant also absented himself due to uncertain and tense situation in Malakand division especially at swat District. As the appellant is a trained Constable therefore in the best interest of the state he was recommended by SP FRP Malakand Range Swat for re-instatement in service.

He was heard in person. Keeping in view his poor family background, I take a lenient view and the order regarding award of punishment i.e. removal from service is here by set aside. Ex- Constable Muhammad Shahid No.4890 of FRP Malakand Range Swat is here by reinstated in service from with immediate effect. However the period of absence and the intervening period from service are treated as extra ordinary leave without pay.

[Signature]
Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar.

No 7659/EC dated Peshawar the 9 / 10 / 2015.

Copy of above is forwarded to SP FRP Malakand Range Swat for information and necessary action.

Encl - 5/Record
Enquiry Side

OB/OTAS/EC/PO
For 14/9
[Signature]
SP FRP SWAT
14/09/15.

OB No. 319
Date: 14/09/2015

**ATTESTED TO
BE TRUE**

(11)

Annexure A-2

ORDER

This order shall dispose of the departmental appeal lodged by, Ex-Constable Waheed Khan No.4886 of FRP Malakand Range Swat against the order of SP FRP Malakand Range Swat

Ex-Constable Waheed Khan No.4886 was enlisted as Constable on 26.09.2007; He while posted to Platoon No.11 Dir lower absented himself from his lawful duty w.e.f 28.09.2008 till his removal from service. He was issued charge sheet and statement of allegations vide SP Malakand Range Swat office No.750/EC dated 16.12.2008. Thus issued Final Show Cause Notice vide Endst: No.895/EC dated 03.01.2009 and the defaulter Constable was recommended for removal from service by the Enquiry committee. The defaulter Constable Waheed Khan No.4886 was removed from service vide SP Malakand Range Swat Office OB No.23.dated 21.02.2009.

He was heard in person. Keeping in view his poor family background, I take a lenient view and the order regarding award of punishment i.e. removal from service is here by set aside. Ex-Constable Waheed Khan No.4886 of FRP Malakand Range Swat is here by re-instated in service with immediate effect. However the period of absence and the intervening period from service are treated as extra ordinary leave without pay.

Commandant
Frontier Reserve Police
Muzer Pakhtunkhwa, Peshawar.

No 7880/EC dated Peshawar : 109/09/2015.

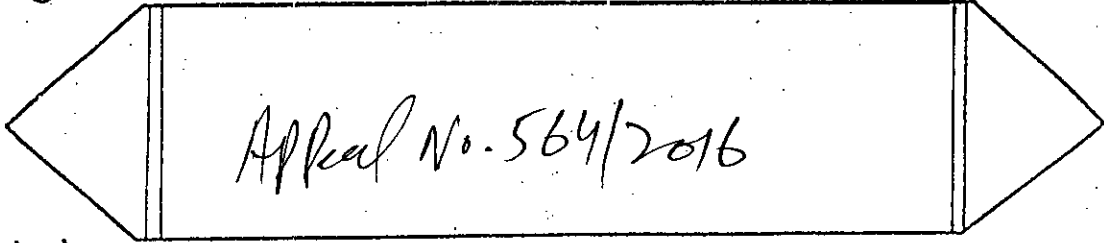
Copy of above along with service record is forwarded to SP FRP Malakand Range Swat for information and necessary action.

Encls- 5/Roll (1)

D/Site (1)

ATTESTED TO
BE TRUE

بعدالت خیر کھنڈو کھو سروس ٹریبونل شیاور



شاہدہ منجانب ایبلانٹ
بنام

موزخہ
مقدمہ
دعوی
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

تفویہ عالم سمیٹ

آن مقام شیاور کیلئے عالم خان (دستبر) - محمد حسن

صنیر صنیر

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
دکیل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ بر حلقہ دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور صولی چیک دروپیا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخ

نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور

کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار

ہوگا۔ اور صاحب مقرر شدہ کو کبھی وہی جملہ مذکورہ یا اختیارات حاصل ہوں گے اور اس کا ساختہ

پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے وہ ہوگا۔

کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی

مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم 13-05-16 ماہ مئی 20

Meena Qadir

Accepted
Meena Qadir

Attested & accepted by
Tanveer Akram Saeed
Advocate

کے لئے منظور ہے۔
Attested and accepted

Alam Khan Adenzai
Advocate

Muhammad Hamza

مفصل خالق و مدیر و سلا سالی سرائی یا بلین
کفیل بصرہ ضلع دیر یا بلین
M-1-0905556-1
03449613870

CMC No. 158/2016

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Service Appeal No. 564/2016

Ex- Constable Fazal Khaliq S/O Yar Dula Khan R/O Sarayee Payan Talash, Timergara,
District Dir Lower.....(Appellant)

VERSUS

1. **Inspector General Of Police, Khyber Pakhtunkhwa Peshawar.**
2. **D.I.G Malakand Region, Saidu Sharif Swat.**
3. **D.PO, Lower Dir.**
4. **S.P FRP Malakand, Region at Swat.....(Respondents)**

Subject:- **COMMENTS ON BEHALF OF RESPONDENTS.**

Respectfully Sheweth!

Preliminary Objections:-

1. The appeal is not based on facts and
2. The appeal is not maintainable in the present form.
3. The appeal is bad for non- joinder of necessary and mis-joinder of unnecessary parties.
4. The appellant has been e-stopped by his own conduct to file the appeal.
5. The appeal is barred by law and limitation.
6. The appellant has not come to the Honorable Tribunal with clean hands.

ON FACTS:-

Pertain to record needs no comments.

- 1) Pertain to record
- 2) Para pertain to the appellant record needs no comments.
- 3) Incorrect, the appellant remained absent from duty w.e.f 28.09.2008 till the date of his removal from service i.e 21.02.2009 for the period of 06 months and 23 days without prior permission of his superiors.
- 4) Incorrect, on the account of aforesaid absence the appellant was issued charge sheet and enquiry committee was constituted. The enquiry committee completed the enquiry proceedings and submitted the finding. After receiving the findings of enquiry committee the competent authority removed him from service after fulfillment the due codal formalities.
- 5) Incorrect, departmental appeal of the appellant along with others were thoroughly examined and the eligible/entitled persons were reinstated in service, while the others along with the appellant, who have not been deserved for reinstatement in service were rejected on sound grounds.
- 6) Incorrect that first appeal of the appellant was rejected on 29.01.2011 and after lapses of 07 years he filled review petition before the Revision Board at CPO Peshawar which was thoroughly examined and rejected on sound ground. Moreover, the cases mentioned by the appellant in the para are not at par with the case of the appellant.
- 7) The appellant has not come to this honorable tribunal with clean hands.


GROUND:-

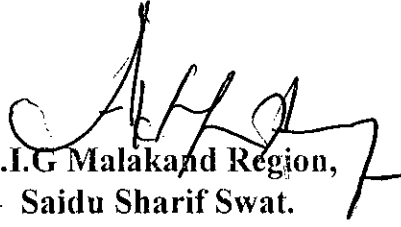
- A. Incorrect, the allegations are false and baseless, as the appellant was equally treated at par with others Ex-defaulter officials.

- B. Incorrect, that the appellant remained absent from lawful duties without prior permission or leave and during the course of enquiry he was summoned time and again to join his duty but he intentionally failed to do so by meaning thereof that he was more interested in the service of police department therefore, he is not deserving to be reinstated in service.
- C. Incorrect, departmental appeal of the appellant along with others were thoroughly examined and the eligible/entitled persons were reinstated in service, while the others along with the appellant, who have not deserved for reinstatement in service were rejected on sound grounds. Moreover, the plea taken by the appellant regarding to reinstatement in service of his other colleagues is not at par with the case of those officials who's were recently reinstated in service. However, no article of the constitution of Pakistan has been violated by the respondent in the case of appellant.
- D. Incorrect the appellant was supposed to have taken the plea mentioned in the para before the enquiry committee or before the competent authority.
- E. Incorrect, the judgment of the superior courts, mentioned by the appellant in the para are not applicable at the case of the appellant. However, the orders of the respondents are legally justified and in accordance with law.
- F. Incorrect during the course of enquiry he was served with charge sheet on his home address but he failed to submit his reply. He was summoned time and again through written 'PARWAN' by the enquiry committee at his home address to join his duty and explain his lawful absence, but he deliberately failed to do so. (Copies of charge sheet, written PARWANA & enquiry report are attached as annexure A, B & C). Besides an opportunity of personal hearing had already been provide by the competent Authority but the appellant deliberately failed to avail this opportunity therefore, the competent authority has awarded him major punishment.
- G. Incorrect the punishment awarded to the appellant is commensurate with the gravity of the appellant gross miss conduct.
- H. The respondents may also be permitted to adduce additional grounds at the time of hearing.


Prayers:-

It is therefore, prayed that the appeal of appellant may be dismissed with cost.


Inspector General of Police,
Khyber Pakhtunkhwa Peshawar.
(Respondent No.1)


D.I.G Malakand Region,
Saidu Sharif Swat.
(Respondent No.2)
Regional Police Officer,
Malakand, at Saidu Sharif Swat.


District Police Officer Lower Dir.
(Respondent No.3)


SP FRP Malakand, Range Swat
(Respondent No.4)

CHARGE SHEET.

"A" (8)

I MR. **Muhammad Qurish Khan** Supt: of Police FRP Malakand Range, Swat as

competent authority here by charge You Mr. Fazal Kalio 4868

That you while posted at Platoon No. 86

a) where as you Constable Fazal Kalio 4868

b) absented your self from your lawful duty vide D.D. Report No. 6 dated 28-8-2008

c) with effect from 28-9-2008 uptile now without leave / permission of the competent authority. Thus issued charge sheet.

2.) By reasons of the above. You appear to be guilty of misconduct under section -- 3 of NWFP (removal from service). specials powers 2000, and have rendered your self liable to or any of the penalties specified in section - 3 of the ordinance bid.

3.) You are, there for required to submit your written defiance with in 07 days of the recd of this charge sheet to the inquiry officer / committee, as the case may be.

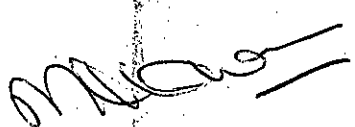
4.) Your write defiance if any should reach the Inquiry Officer committee within the specified period, failing which it shall be presumed that you have no defence to put in and in the event of no expert action shall follow against you.

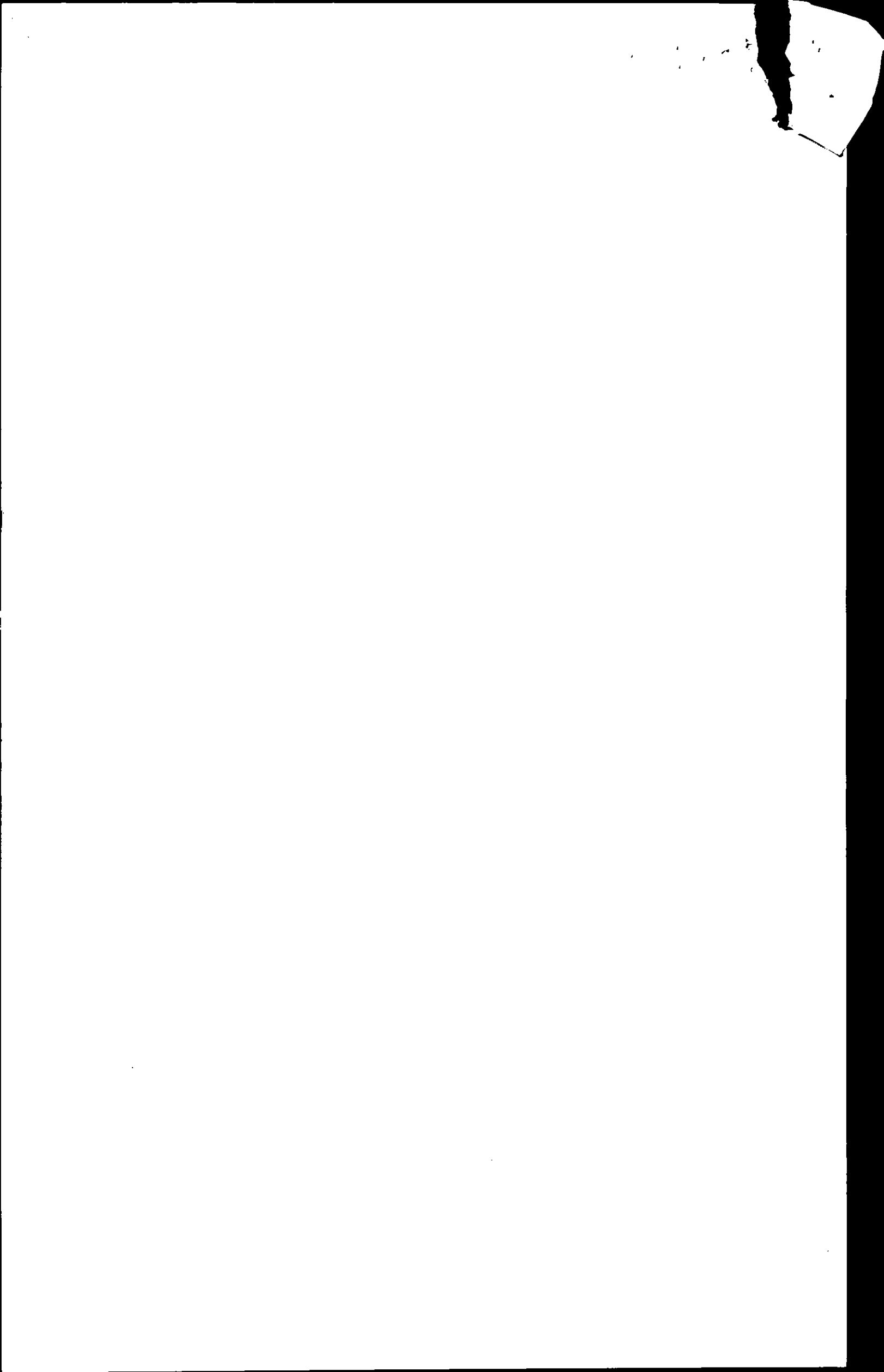
5.) Intimate whether you desire to be heard in persons.

6.) A statement of allegation is enclosed.

No. 757 / EC

Dated: 16/12/2008


Superintendent of Police,
FRP Malakand Range, Swat.



(7)

125

پروانہ بغرض طلبی، حاضری

بنام کنشیل فضل خالق نمبر 4868 پلاٹون نمبر 86 متعینہ = میرا

گھر کا پتہ فضل خالق دربارہ اللہ خان سپرائی پائیس ہیم گٹرہ لوئیر دیہ

تم کنشیل مذکورہ بالا اپنی جائز ڈیوٹی سے از مورخہ 08-9-58 سے تاحال بدستور غیر حاضر ہو۔ چارج شیٹ نمبری 751 مورخہ 08-12-16 کو جاری ہو کر تمہارے گھر کے پتہ پر ارسال ہو چکا ہے۔ تمہاری انکوائری، انکوائری کمیٹی کو مارک کئی گئی ہے۔ لہذا حدایت دی جاتی ہے کہ فوری طور پر جلد از جلد اپنی ڈیوٹی پر حاضر ہو کر اپنے غیر حاضری کے بارے میں اپنا وضاحتی بیان قلمبند کرنے کے واسطے انکوائری کمیٹی کے روبرو پیش ہو جائے اور جاری شدہ چارج شیٹ کا جواب دیں۔ تاکید کی جاتی ہے ضروری ہے۔


RI/SI

ایف۔ آر۔ پی سید و شریف سوات

No. 1664 /EO

Dated 24/12/58

فائینڈنگ رپورٹ محکمہ انسداد انگریزی برخلاف
 کنسٹیبل نضیل خالق نمبر 4868 پلاٹ نمبر
 نمبر 86 متعین حیر کوٹھیہ

| | | | | |
|--|--------|-----------------|-------|-------------|
| موجودہ غیر حاضری | وارننگ | سابقہ غیر حاضری | تعلیم | تاریخ بھرتی |
| 28 ⁰⁹ / ₀₈ سے پہلے | NIL | NIL | F-A | 26-07-2007 |

جناب عالی!

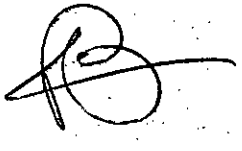
مذکورہ بالا ملازم مد نمبر 6 روز نامچہ 28.9.08 کے مطابق غیر حاضر ہو کر مسلسل غیر حاضری کے بناء بحوالہ آرڈر بک نمبری 143 مورخہ 22.10.08 کو اس کی تنخواہ بند ہو کر چارج شیٹ نمبری 751/EC مورخہ 16.12.2008 کو جاری کی گئی جبکہ یہی کاغذات بغرض مزید انکوائری، انکوائری کمیٹی کو نامک ہوئی۔

انکوائری کمیٹی کے جانب سے پروانہ نمبری 1614/EC مورخہ 24.12.2008 کو غیر حاضر شدہ ملازم کے گھر کے پتہ پر جاری ہو کر مذکورہ ملازم کو تاکید کی گئی کہ اپنے ڈیوٹی پر حاضر ہو کر اپنے غیر حاضری کے وجوہات قلمبند کرنے کے واسطے انکوائری کمیٹی کے روبرو پیش ہو جائے مگر تا حال نہ اپنے ڈیوٹی پر حاضری کی اور نہ انکوائری کمیٹی کی روبرو پیش ہوا۔ جس سے معلوم ہوتا ہے کہ یہ ملازم دیدہ دانستہ اپنی ڈیوٹی سے بلا جواز غیر حاضر ہوا ہے۔

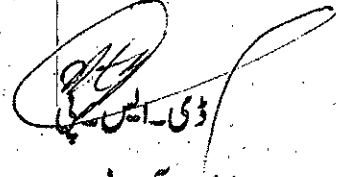
جناب والا!

مورخہ 28.09.2008 سے بدستور اپنے ڈیوٹی سے بلا جواز غیر حاضر ہونا چارج شیٹ کا جواب نہ دینا اور دیدہ دانستہ اپنے غیر حاضری کے وجوہات قلمبند کرنے کے واسطے انکوائری کمیٹی کے روبرو پیش نہ ہونا ڈسپلین رولز کی خلاف ورزی ہے لہذا اس طویل اور مسلسل غیر حاضری کے بناء پوئس آرڈر 2002ء کے آرٹیکل 113 کے تحت تاریخ غیر حاضری از مورخہ 28.09.2008 سے ڈسچارج کرنے اور فائینل شو کاز نوٹس جاری کرنے کی سفارش کی جاتی ہے۔ فائینڈنگ رپورٹ مرتب ہو کر بغرض مزید کارروائی پیش خدمت ہے۔

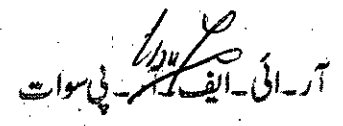
کمیٹی ممبران



لائن آفیسر ایف۔ آر۔ پی سوات



ایف۔ آر۔ پی سوات



OR
M. S. Khan

Approved
M. S. Khan

31/12/08

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No.564/2016

Fazal Khaliq.....**Appellant**

V E R S U S

Inspector General of Police & others.....**Respondents**

REJOINDER TO PARAWISE COMMENTS
FILED BY RESPONDENTS

Respectfully Sheweth

Preliminary objections:

1. Preliminary Objection No.1 is incorrect.
2. Preliminary Objection No.2 is also incorrect and general in nature.
3. Preliminary Objection No.3 is also incorrect all the respondents are necessary parties.
4. Incorrect, Appellant has every right to file the instant appeal.
5. Incorrect, appeal of the appellant is within time.
6. Incorrect, appellant has come to this Hon'ble Tribunal.

ON FACTS:

1. Reply to Para No.1 needs no reply.
2. Reply to Para No.2 needs no reply
3. Reply to Para No.3 is incorrect, appellant was busy in solving his serious domestic problems.
4. Reply to Para No.4 is also incorrect, appellant was neither served with any effective notice and nor mode of service of notice was adopted by respondents as prescribed by law, moreover appellant was condemned unheard no opportunity of personal hearing was provided to appellant and so called enquiry committee opined for final show cause notice which was also not issued.
5. Reply to Para No.5 is also incorrect cases of all the appellants were similar in nature but respondents made pick and choose thus opened gate to favoritism and nepotism moreover codal formalities were never adopted in the case of appellant.
6. Para No.6 is also incorrect, appellant filed review/revision before revision board alongwith many other officials but once again appellant was treated unequally as some of the review/revision was

allowed while review/revision of the petitioner was rejected without assigning any cogent reasons. (copies are already attached).

7. Reply to Para No.7 is also incorrect, appellant has come to this Hon'ble Tribunal with clean hands.

ON GROUNDS

- A. Reply to ground A is incorrect cases of all the appellants were similar in nature but respondents made pick and choose thus opened gate to favoritism and nepotism moreover codal formalities were never adopted in the case of appellant
- B. Reply to ground B is also incorrect. appellant was busy in solving his serious domestic problems, appellant was neither served with any effective notice and nor mode of service of notice was adopted by respondents as prescribed by law moreover appellant was condemned unheard no opportunity of personal hearing was provided to appellant.
- C. Reply to ground C is also incorrect respondents have never differentiated case of the appellant from the cases of other officials who were reinstated into

service, which is clear cut violation of the Article-8 and 24 of the constitution of Pakistan.

- D. Reply to ground D is also incorrect appellant was condemned unheard, he was neither served with effective notice nor opportunity of personal hearing was provided to him.
- E. Reply to ground E is also incorrect, judgments of the superior courts are binding on all the departments of the Govt. in the light of these judgments orders of the respondents are not sustainable.
- F. Reply to Ground F is also incorrect, cases of all the appellants were similar in nature but respondents made pick and choose thus opened flood gate to favoritism and nepotism moreover codal formalities were never adopted in the case of appellant beside that so called inquiry community opined for final show cause notice which was also not issued.
- G. Reply to ground G is also incorrect, respondents have not fulfilled all codal formalities and awarded maximum punishment in a hip hazard manner therefore the same is liable to set aside.
- H. Reply to ground H needs not reply.

It is, therefore most humbly prayed that impugned orders of the respondents may please be set aside and appellant may be reinstated in to service with all back benefits.

Respondents
Through



Alam Khan Adenzai
Advocate High Court

Dated 24.02.2017

AFFIDAVIT

It is stated on oath that the contents of the **rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.




DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 564/2016

FAZAL KHALIQ.....(Appellant)

Versus

Inspector General Of Police And Others.....(Respondents)

APPLICATION FOR PLACING ON FILE COPIES OF ORDER
DATED 21.02.2009 VIDE WHICH THE APPELLANT HAS BEEN
REMOVED FROM SERVICE, ORDERS DATED 04.02.2011 AND
08.12.2015 VIDE WHICH DEPARTMENTAL APPEALS OF THE
APPELLANT HAS BEEN REJECTED AND MEDICAL
PRESCRIPTION OF THE APPELLANT'S FATHER.

Respectfully sheweth:-

1. That the above captioned appeal is pending before this hon'ble tribunal.
2. That from the day first it is the contention of the appellant that during the days of absence from duty and removal from service, father of the appellant was seriously ill and was under treatment. Similarly at the time of submission of appeal the above mentioned copies of orders and prescriptions were inadvertently not placed on file in time.
3. That for the interest of justice, there is no hurdle in placing on file the same documents.

As such, on acceptance of the instant application, copies of medical prescription and above orders may kindly be placed on file.


APPELLANT


FAZAL KHALIQ

AFFIDAVIT:

It is stated on oath that the contents of this application are true and correct to the best of my knowledge and belief.

ATTESTED


UMAR SADIQ Advocate,
OATH COMMISSIONER
Distt: Courts Swat.
No. 322 Date: 24-04-18

DEPONENT


FAZAL KHALIQ

BEFORE THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 564/2016

FAZAL KHALIQ.....(Appellant)

Versus

Inspector General Of Police And Others.....(Respondents)

APPLICATION FOR PLACING ON FILE COPIES OF ORDER DATED 21.02.2009 VIDE WHICH THE APPELLANT HAS BEEN REMOVED FROM SERVICE, ORDERS DATED 04.02.2011 AND 08.12.2015 VIDE WHICH DEPARTMENTAL APPEALS OF THE APPELLANT HAS BEEN REJECTED AND MEDICAL PRESCRIPTION OF THE APPELLANT'S FATHER.

Respectfully sheweth:-

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3. That for the interest of justice, there is no hurdle in placing on file the same documents.

As such, on acceptance of the instant application, copies of medical prescription and above orders may kindly be placed on file.


APPELLANT


FAZAL KHALIQ

AFFIDAVIT:

It is stated on oath that the contents of this application are true and correct to the best of my knowledge and belief.

ATTESTED


UMAR SADIQ Advocate,
OATH COMMISSIONER
Distt: Courts Swat.
No. 322 Date 04-04-18

DEPONENT


FAZAL KHALIQ

BEFORE THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 564/2016

FAZAL KHALIQ.....(Appellant)

Versus

Inspector General Of Police And Others.....(Respondents)

APPLICATION FOR PLACING ON FILE COPIES OF ORDER
DATED 21.02.2009 VIDE WHICH THE APPELLANT HAS BEEN
REMOVED FROM SERVICE, ORDERS DATED 04.02.2011 AND
08.12.2015 VIDE WHICH DEPARTMENTAL APPEALS OF THE
APPELLANT HAS BEEN REJECTED AND MEDICAL
PRESCRIPTION OF THE APPELLANT'S FATHER.

Respectfully sheweth:-

1. That the above captioned appeal is pending before this hon'ble tribunal.
2. That from the day first it is the contention of the appellant that during the days of absence from duty and removal from service, father of the appellant was seriously ill and was under treatment. Similarly at the time of submission of appeal the above mentioned copies of orders and prescriptions were inadvertently not placed on file in time.
3. That for the interest of justice, there is no hurdle in placing on file the same documents.

As such, on acceptance of the instant application, copies of medical prescription and above orders may kindly be placed on file.

APPELLANT



FAZAL KHALIQ

AFFIDAVIT:

It is stated on oath that the contents of this application are true and correct to the best of my knowledge and belief.

ATTESTED


UMAR SADIO Advocate,
OATH COMMISSIONER
Distt: Courts Swat.

No. 322 Date 04-04-18

DEPONENT



FAZAL KHALIQ

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

SERVICE APPEAL NO. 564/2016

FAZAL KHALIQ.....(Appellant)

Versus

Inspector General Of Police And Others.....(Respondents)

**APPLICATION FOR PLACING ON FILE COPIES OF ORDER
DATED 21.02.2009 VIDE WHICH THE APPELLANT HAS BEEN
REMOVED FROM SERVICE, ORDERS DATED 04.02.2011 AND
08.12.2015 VIDE WHICH DEPARTMENTAL APPEALS OF THE
APPELLANT HAS BEEN REJECTED AND MEDICAL
PRESCRIPTION OF THE APPELLANT'S FATHER.**

Respectfully sheweth:-

1. That the above captioned appeal is pending before this hon'ble tribunal.
2. That from the day first it is the contention of the appellant that during the days of absence from duty and removal from service, father of the appellant was seriously ill and was under treatment. Similarly at the time of submission of appeal the above mentioned copies of orders and prescriptions were inadvertently not placed on file in time.
3. That for the interest of justice, there is no hurdle in placing on file the same documents.

As such, on acceptance of the instant application, copies of medical prescription and above orders may kindly be placed on file.

APPELLANT




FAZAL KHALIQ

AFFIDAVIT:

It is stated on oath that the contents of this application are true and correct to the best of my knowledge and belief.

ATTESTED


**UMAR SADIQ Advocate,
OATH COMMISSIONER
Distt: Courts Swat.
No. 322, Date: 04-04-18**

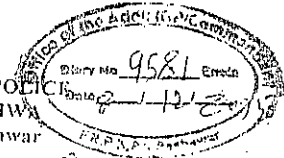
DEPONENT



FAZAL KHALIQ



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar



No. S/ 5832 /15, Dated Peshawar the 8/12/2015

ORDER

This order is hereby passed to dispose of departmental appeal under Rule 11-a of Khyber Pakhtunkhwa Police Rule-1975 submitted by Ex- Constable Fazal Khaliq No. 4868. The appellant was awarded punishment of Removal from service by SP/FRP Malakand Range Swat vide OB No. 23 dated 21.02.2009. :

He preferred an appeal against the order of SP/FRP Malakand Range Swat before the Commandant, FRP, Khyber Pakhtunkhwa, Peshawar which was also rejected vide order No. 97-98/EC, dated 04.01.2011.

The Review Petition Board meeting was held on 20.11.2015, wherein the appellant appeared and heard in person. The enquiry papers were also perused. The appellant was absented himself from lawful duty during insurgency at Swat. His service was less than 03 years and his appeal is also time barred. Hence the appeal of Ex-Constable Fazal Khaliq No. 4868 is hereby rejected.

Sd/-
NASIR KHAN DURRANI
Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

No. S/ 5833-40/15,

Copy of the above is forwarded to the:

1. Addl: IGP/Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. PRO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
5. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV, CPO, Peshawar.
8. Central Registry Cell (CRC) CPO.

OB No. 406
Date 15/12/2015

0143 / EC SP FRP Swat

12-15 for n/a action

COMMANDANT
Frontier Reserve Police,
Khyber Pakhtunkhwa,
Peshawar

(NAJEEB-UR-RAHMAN BUGVI)
AIG/Establishment
For Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

OB/AS/EC
For n/a

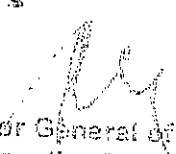
ORDER.

This order shall dispose off on the appeal preferred by Ex-Constable Fazal Khaliq No.4868 of FRP Malakand Range Swat against the order of SP FRP Malakand Range wherein he was removed from service.

Brief facts of the case are that while he absented himself from duty with effect from 28.09.2008 till the date of removal from service without any leave/permission of the competent authority for a total period of 15 months and 23 days. He was issued charge sheet/statement of allegation. DSP/ RI/LO-1 FRP Malakand Range Swat were appointed as enquiry officers. After conducting enquiry, the enquiry officers submitting findings wherein the above named official was recommended for punishment.

Keeping in view his prolong absence as well as recommendation of enquiry officers he was removed from service from the date of his first absence by the SP FRP Malakand Range Swat vide his OB No.23 dated 21.02.2009.

However, from the perusal of record and findings of Enquiry Officer, there are no cogent reasons to interfere in the order of SP FRP Swat. Therefore his appeal is rejected.


Addl: Inspector General of Police
/Commandant Frontier Reserve Police
Khyber Pakhtoonkhwa Peshawar.

No 97-98

EC dated Peshawar the 04/02/09

Copy of above is sent for information and n/a to:-

1. Supdt: of Police FRP Swat w/r to his M/No.1275/EC dated 18.12.2008. His service record and departmental enquiry file are returned herewith

2. Ex-Constable Fazal Khaliq No.4868 S/o Yaqin Dullah Khan R/o village Sarai Payan Talash Police Station Timergara District L/D/O.

ORDER

F.C Fazal Khaliq No. 4868. Platoon No. 86 Dir Lower FRP, Malakand Range,
has remained absent from lawful duty from 28.09.2008 to date.

He was proceeded against departmentally under the NWFP Removal from Service (Special Powers) Ordinance, 2000, with duly constituted Inquiry Committee comprising the following police officers:

1. Hazrat Ali Khan, DSP FRP Swat.
2. S.I Rehmat Ali Khan, R.I FRP Lines, Swat.
3. S.I Bacha Khan, L.O FRP Lines, Swat.

The Inquiry Committee had completed all the requisite codal formalities and submitted the enquiry report, wherein it has been observed that the defaulter F.C Fazal Khaliq No. 4868 was enlisted in FRP on 26-07-2007. The defaulter F.C Fazal Khaliq No. 4868 deserted the force during an emergency situation and thus demonstrated cowardice in the line of duty. Later on, he was given the opportunity to join his duty but he failed to do so. In the light of the above inquiry report, the Inquiry Committee has found the defaulter constable guilty of charges and recommended his removal from service.

I, the undersigned, have thoroughly perused the enquiry report and the inquiry papers of the Inquiry Committee. The defaulter constable has been provided an ample amount of opportunity for personal hearing but he never availed this chance. I fully agree with the findings and recommendations of the Inquiry Committee. Therefore, the defaulter F.C Fazal Khaliq No. 4868, Platoon No. 86 FRP, Dir Lower Malakand Range, is hereby removed from service from the first date of his absence of official duty.


Order announced.

/

**Superintendent of Police,
FRP, Malakand Range, Swat.**

No. 227
Dated 27/9 /2008

Copy to the worthy Commandant, Frontier Reserve Police, N.W.F.P. Peshawar, for favour of kind information, please.


**Superintendent of Police,
FRP, Malakand Range, Swat**

Telephone and Fax No. 0946-9240258.

From: - The Superintendent of Police, FRP,
Malakand Range, Swat.

To: - The Additional I.G.P/Commandant,
Frontier Reserve Police,
K.P.K Peshawar.

No. 1275 /EC, Dated Saidu Shrif the 18/12 /2010.

Subject:- **APPLICATION FOR RE-INSTATEMENT.**

Memorandum.

Kindly refer to your office Endst: No. 7848/EC, dated 14/12/2010.

It is submitted for your kind perusal/ information that the appellant Ex-Constable namely Fazal Khaliq No. 4868 of FRP Malakand Range was enlisted as Constable in FRP on 26/07/2007. He while posted to Platoon No. 86 FRP, Dir-Lower absented himself with effect from 28/09/2008 uptill now vide D.D No. 06 dated 28/09/2008 during the emergency situation in the District. Therefore departmental proceeding were initiated against him.

On the completion of Enquiry proceedings, he was removed from Service under the removal from service (Special Power) Ordinance 2000 with effect from his first date of absence i.e. 28/09/2008 vide this office O.B. No. 138 dated 28/09/2008.

His application alongwith departmental Enquiry File containing () Sheets and Service Roll is submitted herewith for kind consideration/ orders, which may kindly be returned to this office for record when no longer required please.

- Encls: 1) Appeal Application-(One)
2) Departmental File (0) Sheets
3) S. Roll = (One)

Superintendent of Police, FRP
Malakand Range, Swat

18/12

Waheed A Sahibzada

F.R.C.P.(C)

Diplomat American Board of Internal Medicine
Diplomat American Board of Cardiology



Rehman Medical Institute
5/B-2 Phase-V Hayatabad
Peshawar, Pakistan
Phone: 5825501-07
Extension 116

Date 6/2/2008

Yard Allah 774

- 1. Hypertension
- Stable

BP 140/90

AD (1) ECG

(2) Echocardiogram

to

Cardioselect

Digoxin 0.125

Atorva 10 P
1 at night

BAHADUR KHAN, ROZI KHAN MEMORIAL HOSPITAL



Opp: D.H.Q. Hospital Bakhela, Tel: (0932) 413281

MEDICARE Diagnostic Services

Laboratory, Ultrasound, E.T.T, X-Ray, ECG, Blood Bank & Vaccination

NAME : YARDULLAH DATE : 05/02/2008
SEX : MALE TIME : 10:49:25
AGE : ? REPORT # : 68
SPECIMEN : BLOOD REFERED BY : SELF
TEST REQUIRED : SU R, UREA, CHOL

RESULT

| TEST | RESULT | UNITS | NORMAL RANGE |
|-------------|--------|-------|--------------|
| UREA | 20 | mg/dl | 10 ----- 45 |
| CHOLESTEROL | 199 | mg/dl | Upto 200 |
| SUGAR R | 120 | mg/dl | 80 ----- 160 |

Lab Incharge

Collection Point: The Aga Khan University Hospital, Karachi
Shifa International Hospital Islamabad

05/02/08 Q.P.M

Present Medications -

Tab Cardisid 5mg q.d

ق.د ١١

Tab Disform C.v

ق.د

ق.د ١١

B.P

160 / 85



DEPARTMENT OF CARDIOLOGY
 ISLAMABAD HOSPITAL
 PAKISTAN INSTITUTE OF MEDICAL
 SCIENCES
 G-8/3 ISLAMABAD

| | |
|----------------|------------------------|
| Pin Code No. | <input type="text"/> |
| Patient's Name | <u>Far Abdulhali</u> |
| Age | <u>60</u> Sex <u>M</u> |
| Consultant | <u>Dr. Shabir</u> |
| Cath No. | <u>747</u> |
| Date | <u>17/8/09</u> |

| DATE/TIME | POST PERCUTANEOUS TRANSLUMINAL CORONARY ANGIOPLASTY (PTCA0 / CORONARY INTERVENTIONAL PROCEDURE) | NURSE (✓) |
|-----------|---|--------------|
| | (Check each item and sign when completed; fill in blank spaces) | |
| | 1. Resume diet _____ hours post procedure, if patient stable. | |
| | 2. Strict bed rest (with cannulated extremity straight) May elevate HOB up to 30 degrees. May lie lateral with extremity straight. May ambulate _____ hours after sheath is removed, if patient & site are stable | |
| | 3. Vital signs: a) Post Procedure & Post sheath removal - every 15 minutes for 1 hour, Every 30 minutes for 2 hours, then every 4 hours b) Sheath situ - q 1 hourly Do not take BP on arm, if used for procedure. | |
| | 4. Check puncture site (s) and neurovascular status of involved extremity with vital signs. | |
| | 5. Notify physician immediately of any problems (bleeding , pain deterioration of pulse, Impaired sensation or movement, etc.) | |
| | 6. Cardiac monitoring . | |
| | 7. Arterial pressure monitoring via femoral arterial line (if sheath is to remain overnight) | |
| | 8. ECG now, hours post procedure, and in AM / PM. | |
| | 9. Cardiac enzymes _____ hours post procedure, and in AM / PM. | |
| | 10. Analgesia : Acetaminophen 300 mg + Codeine 30 mg (Tylenol #3) 1-2 tabs PO every 4 hours pm. Lorazepam 1 mg PO hs pm. | |
| | 11. IV fluids _____ at _____ ml/hour for _____ hours | |
| | 12. Renew the following medications : - Remove sheath at 6 pm - Monitor heart rate + BP - Digoxin CV 1mg Po 100 - Ramipril 5mg Po 100 - Lasix 20mg Po 100 Syf / Insulin 7/30 Syf 12 units morning 8 units evening | |
| | 13. Start the following (new) medications : | |
| | 14. Sheath removal by _____ MD _____ SN1. | |

ate: 17/8/09 Signature: [Signature] M.D. Pager: _____
 PHYSICIAN ORDER FORM

Pakistan Institute of Medical Sciences
Department of Immunology

Patient Control # : P-06/09-17490

Receipt # : *****

Patient Name : YARD ABDULLAH

Age : 70 Yr(s)

Sex : Male

Sample date : Aug 13 2009 10:15AM

OPD: Emergency OPD #: 303/09/08/07000

Specimen : Serum

Order # : 08/09-08912

Lab # : 08/09-08912

HCV By third generation Elisa

| Test Name | Result |
|--------------|----------|
| HCV (Elisa) | Negative |
| Patient's OD | 0.039 |
| Cut off OD | 0.276 |

HBsAg (3rd Gen Elisa)

| Test Name | Result |
|---------------|----------|
| HBsAg (Elisa) | Negative |
| Patient's OD | 0.015 |
| Cut off OD | 0.066 |

Pathologist Comments

Please correlate with clinical data and other investigations. Please Discuss.

Dr. Shagufta Hussain

Consultant Microbiologist

Ph: 9261170 Ext 2480, 2244

Reporting date 15/08/2009 01:08:35 PM

یہ رپورٹ کنٹرول نمبر ہے۔ یہ نمبر سنبھال کر رکھیں اور ہمیشہ ہمزہ ہسپتال آنے پر اپنے ساتھ لائیں۔ P-06/09-17490

LMIS , A CRM Product

Pakistan Institute of Medical Sciences

Department of Chemical Pathology

17/08/2009

Patient Control #: P-06/09-17490

Receipt #: *****

Patient Name: YARD ABDULLAH

Age: 70 Yr(s)

Sex: Male

Sample date: Aug 13 2009 10:15AM

OPD: Emergency OPD #: 303/09/08/07000

Specimen: Serum

Order #: 08/09-08912

Lab #: 08/09-08912

| Test Name | Conventional System | | System International (SI) | |
|----------------------|---------------------|-----------------|---------------------------|-------------------|
| | Result | Normal Range | Result | Normal Range |
| Bilirubin Total | 0.77 | 0.3 - 1.2 mg/dL | 13.2 | 5.1 - 20.5 µmol/L |
| ALT- SGPT | 26 | 4 - 42 U/L | 26 | 4 - 42 U/L |
| Alkaline Phosphatase | 84 | 40 - 130 U/L | 84 | 40 - 130 U/L |
| Urea (S) | 16 | 13 - 43 mg/dL | 2.7 | 2.2 - 7.1 mmol/L |
| Creatinine | 0.84 | 0.6 - 1.3 mg/dL | 74.3 | 53 - 114.9 µmol/L |
| Sodium | 141 | 136 - 146 mEq/L | 141 | 136 - 146 mmol/L |
| Potassium (S) | 3.8 | 3.5 - 5.1 mEq/L | 3.8 | 3.5 - 5.1 mmol/L |
| Glucose (random) | 148 | 60 - 200 mg/dL | 8.2 | 3.3 - 11.1 mmol/L |

Pathologist Comments

Please correlate with clinical data and other investigations.

Sample is available for seven days. Please call undersigned for result re-check if required.

Dr. Haroon Khan

Consultant Chemical Pathologist

Ph: 9261-170 Ext(2374,2244

Reporting date 13/08/2009 01:06:41 PM

یہ آپ کا پیشنت کنٹرول نمبر ہے۔ یہ نمبر سنبھال کر رکھیں اور ہمیشہ میز ہسپتال آنے پر اپنے ساتھ لائیں۔ P-06/09-17490

LMIS, A CRM Product

Pakistan Institute of Medical Sciences
Department of Haematology

Patient Control #: P-06/09-17490

Receipt #: *****

Patient Name: YARD ABDULLAH

Age: 70 Yr(s)

Sex: Male

Sample date: Aug 13 2009 10:15AM

OPD: Emergency OPD #: 303/09/08/07000

Specimen: P (NaCit)

Order #: 08/09-08912

Lab #: 08/09-08912

| Test Name | Result | Normal Range |
|-----------------------|--------|--------------|
| APTT | 37 | 28 - 42 Sec |
| Control APTT | 32 | 28 - 42 Sec |
| Prothrombin Time (PT) | 17 | 10 - 14 Sec |
| Control PT | 13 | 10 - 14 Sec |

Pathologist Comments

Please correlate with clinical data and other investigations. Please Discuss.

Dr. Khalid Hassan

Consultant Haematologist

Reporting date 15/08/2009 02:04:31 PM

یہ رپورٹ کنٹرول نمبر ہے۔ یہ نمبر سنبھال کر رکھیں اور ہمیشہ عمز ہسپتال آنے پر اپنے ساتھ لائیں۔ P-06/09-17490

LMIS, A CRM Product

Pakistan Institute of Medical Sciences
Department of Haematology

Patient Control #: P-06/09-17490

Patient Name: YARD ABDULLAH

Age: 70 Yr(s)

Receipt #: *****

Sex: Male

Sample date: Aug 13 2009 10:15AM

OPD: Emergency OPD #: 303/09/08/07000

Specimen: EDTA (WB)

Order #: 08/09-08912

Lab #: 08/09-08912

Test Name

Result

Normal Range

Complete Blood Picture

| | | |
|----------------|--------|----------------------------|
| WBC | 7800 | 4000 - 11000 / μ L |
| RBC | 5.07 | 3.5 - 5.6 million/ μ L |
| HB | 14.2 | 11 - 18 g/dL |
| HCT | 42.3 | 32 - 53 % |
| MCV | 83.4 | 79 - 101 fL |
| MCH | 28 | 26 - 35 pg |
| MCHC | 33.6 | 31 - 37 g/dL |
| Platelet Count | 225000 | 150000 - 400000 / μ L |
| LYM% | 22.9 | 12 - 50 % |
| MXD% | 6.3 | 0 - 7 % |
| NEUT% | 70.8 | 37 - 75 % |
| LYM# | 1.8 | 1 - 3.5 / μ L |
| MXD# | 0.5 | 0 - 8 / μ L |
| NEUT# | 5.5 | 2 - 7.5 / μ L |
| PDW | 13.3 | 9 - 17 fL |
| MPV | 10.3 | 9 - 13 fL |

Pathologist Comments

Please correlate with clinical data and other investigations. Please Discuss.

Dr. Khalid Hassan

Consultant Haematologist

Reporting date 15/08/2009 02:04:31 PM

یہ رپورٹ کنٹرول نمبر ہے۔ یہ نمبر سنبھال کر رکھیں اور ہمیشہ پمز ہسپتال آنے پر اپنے ساتھ لائیں۔ P-06/09-17490

LMIS - A CRM Product

ISLAMABAD HOSPITAL
PAKISTAN INSTITUTE OF MEDICAL SCIENCES
ISLAMABAD



06/09-17490

Date:

Age

70

Sex

M

YAR

Room

#24

ABDULLAH

DISCHARGE

DISCHARGE CERTIFICATE

Date of Admission

13/8/09

DEPARTMENT

CWD

SURGEON

Dr. Iqbal

DATE OF ADMISSION 13th June, 2009

DATE OF DISCHARGE 16th June, 2009

HOSPITAL COURSE

is a diagnosed case of hypertension & diabetes for last 2 yrs - He had
TIA of left side 1 month back - CT scan Brain without contrast
was done which showed - multiple infarcts in basal ganglia on (R)

INVESTIGATIONS

& parietooccipital infarcts (L) side.

duplex doppler done which showed 63% atheroma on (R) side & stenosis
left side - 80% - He was advised CT Angiography which showed

DISCHARGE DIAGNOSIS

Rt external carotid Artery - 60% stenosis

Rt internal carotid artery - 90% stenosis

Rt common carotid - Normal

Lt external carotid Artery - severe carotid artery disease

Lt internal carotid artery - Totally occluded (significant disease)

INSTRUCTIONS

Lt common carotid Artery - Normal

He is now advised intervention to Right internal carotid
artery.

RETURN APPOINTMENT

LAI

Follow up in cardiac OPD -

LABs handed over to the patient.

DOCTOR'S SIGNATURE:

Iqbal

Tab Disprin CV 1x0D
100mg

ایک گولی روزانہ
کھانے کے بعد

Tab AMRAX 5mg 1x0D

ایک گولی روزانہ

Tab RAMIPACE 5mg 1x0D

ایک گولی روزانہ

Tab SURVIVE 20mg 1xHS

ایک گولی رات کھانے کے بعد

Tab Glucophage 500mg (1+1)

ایک گولی صبح + شام
پیشورے سے کھانے کے بعد

(X)

Tab DAONIL 5mg (1x0D)

ایک گولی روزانہ
کھانے کے بعد پیشورے سے

(Hard)

INSULIN (R)

quant slc TDS

ISLAMABAD HOSPITAL
PAKISTAN INSTITUTE OF MEDICAL SCIENCES
ISLAMABAD



Date
18/08/09

Age Sex
70 M

Room
08

WARD
ABDULLAH

DISCHARGE

Date of Admission
17/08/08

DEPARTMENT
CCU

SURGEON
DR. SHAHID

DISCHARGE CERTIFICATE

DATE OF ADMISSION 17/08/09

DATE OF DISCHARGE 18/08/09

HOSPITAL COURSE pt is a A K/C HTN n DM for 2 yrs. He had CVA left side 1 mth back. CT scan brain e-contrast showed multiple infarcts in basal ganglia on R & parieto-occipital infarct L side.

INVESTIGATIONS Carotid doppler done e showed 63% stenosis R side 83% stenosis L side. Rt Ext carotid 60% stenosis. Rt internal carotid 90% stenosis. Also 90 TIA on n off.

DISCHARGE DIAGNOSIS Admitted for intervention to R int carotid artery

O/E ✓

O/S

INSTRUCTIONS: BP 100/60 mmHg
Pulse 86/min
Temp AF
CVC 2 + 2 to
Chest B/L clear
CXR UL LL
Tone N N N N
Reflexes 4/5 4/5 4/5 4/5

Carotid doppler
R side 63% stenosis
L side 83% stenosis

RETURN APPOINTMENT
Plantars ↓ ↓

A Carotid Artery Disease
(intervention to R int carotid artery)

DOCTOR'S SIGNATURE: _____

Re

- | | |
|------------------------------|-------------------------------|
| • Tab Disprin CV 100 mg x OD | ایک گولی روزانہ |
| • Tab Ramipace 5 mg x OD | ایک گولی روزانہ |
| • Tab Survive 20 mg x OD | ایک گولی روزانہ |
| • Tab Lowplat 75 mg x OD | ایک گولی روزانہ صبح |
| • Tab Daonil 5 mg x OD | ایک گولی روزانہ ناشتے سے پہلے |

Follow up in Cardia OPD ہفتہ وار

دل کی افلی ڈی میں دو سیکور معمرات کا دن آکر دکھائیں۔

Dr. Shariq

06/09 - 17690



ISLAMABAD HOSPITAL
BLOOD TRANSFUSION SERVICES
PAKISTAN INSTITUTE OF
MEDICAL SCIENCES
ISLAMABAD

951

[Handwritten initials]

BLOOD TRANSFUSION REQUEST

- 1 Patient's Name Yasir Abdillel
- 2 Age 60 yrs Sex ♂
- 3 Date 12/08/09
- 4 Hospital Ward, Bed No. ~~CAD 20~~ Cadology, bed # 2
- 5 Indication for Transfusion
- 6 Whether Whole Blood or Components are required RCC
- 7 No. of units required 1 unit
- 8 Date and time when required 12/08/09, 10:00 a.m.
- 9 Blood group of Patient if done earlier Not known
- 10 Previous H/O Blood Transfusion/Pregnancies, if any -
- 11 Any history of blood Transfusion Reactions -
- 12 Date and Time of Blood Sample taken 12/08/09, 10:00 a.m.
- 13 Name and signature of requesting Doctor *[Signature]*

B+

PAKISTAN INSTITUTE OF MEDICAL SCIENCES
G-8/3, ISLAMABAD, Ph: 9260329

Department of Angiography

Patient Name : Yard Abdullah
Age : 60 Years
Sex : Male
Height : "
Weight : Kg
Date : 17.08.2009
Angio No : 948-B/2009

Procedure: Carotid stenting of right Internal Carotid Artery

CATHETER PROCEDURE: Left femoral artery external through modified Seldinger's, technique and 8 F sheath passed.

After completion of the study, catheters and guidewires were removed, hemostasis achieved with local pressure and sterile dressing with pressure bandage.

Previous Angio:

100% stenosis of left internal carotid artery.
80% stenosis of right internal carotid artery.

CATHETER USED:

6 Fr sheath passed RFA

JL 4 8F

JR 4 8F

HEMODYNAMIC DATA:

Pre angio AO : 130/80 mm Hg

PCI to Right Internal Carotid Artery:


Right common carotid artery engaged with 8 F multiple catheter.

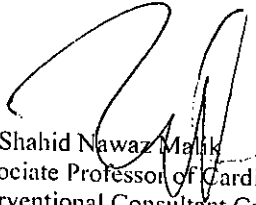
Accumet (Distal Protection) Device placed in right internal carotid artery and position secured very well.

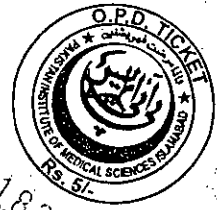
Acculink 7 x 10 mm carotid stent placed, it occluded the vessel and even patient had convulsions during this procedure and recovered soon after deployment of stent. The stent was postdilated with 5.0 x 20 mm balloon and adequate expansion achieved.

Patient left cath lab in stable condition fully conscious and moving all limbs.

Sheath sutured.


Dr. Fazlul Aziz
Registrar Cardiology,
PIMS, Islamabad


Dr. Shahid Nawaz Malik
Associate Professor of Cardiology /
Interventional Consultant Cardiologist &
Director of Interventional Cardiology Deptt.
PIMS Islamabad



ICN : P-11/09-19656
OPD Name : Cardiology
Patient Name : YAR ULLAH
Age : 70
Address :
Payment Type : Referred From

OPD # : 263/09/11/01678 OPD Visit #
Date : 16/11/2009 09:23:56AM
F/N : KHLAID KHAN
Sex : Male
City : ISLAMABAD

No. 1844971

54

P-11/09-19656

Complaint / Diagnosis : Treatment

B.P) 90/100 - 11/7

Now asymptomatic

TIA

AD

Tab. Dispersin CV
100 T
1 + 0 + 0

Tab. Lozatin
50 T
1 + 0 + 0

Tab. Raytur
10 T
0 + 0 + 1

Tab. Concor
5 T
0 + 1 + 0

Tab. Doanil 5 T
1 + 0 + 0

Tab. Ognel plus
Nil

2

Resident: Bilal

Amend By: FIMSS Staff

Re-Amend By:

PAKISTAN INSTITUTE OF MEDICAL SCIENCES ISLAMABAD
ISLAMABAD HOSPITAL

: P-11/09-19656

OPD # : 263/09/12/01652

OPD Visit # : 2

Specialty : Cardiology

Date : 14/12/2009 12:21:49PM

Patient Name : YAR ULLAH

F/B : KHLAID KHAN

Age : 70

Sex : Male

City : ISLAMABAD

Country : Pakistan

153

Amend By: FIMSS Staff P-11/09-19656

Joint Diagnosis :

Treatment

B.P 170/100 - 1

A symptoms

Tab. Dispenin CV ✓
100 - 7
1-7-0-70.

Tab. Trinitic HET ✓
25/125 - 7
1-7-0-70.

Tab. Corgrel plus ✓
1-7-0-70.
Tab. Plazafin ✓
500 - 7
1-7-0-70.

R

Tab. Raytr ✓
10 - 7
5-7-0-70.

Tab. Con CV ✓
روسیٹر کو اینڈ ڈی

PAKISTAN INSTITUTE OF MEDICAL SCIENCES
CARDIOLOGY DEPARTMENT

Patient Name: Yard Abdullah
Referring Physician: Prof. Dr. Iqbal Saifullah Khan
Date: 13/06/2009

Age/Sex: 70/M
ID: 329/2009

CT Cardiac Angiography Scan:

• *Technique: Imaging was performed on 64 slice CT Scanner using contiguous axial tomographic slices from the base through to the apex of heart. Images were generated using Circulation and Inspace 4D software.*

Calcium Score :

Left:
CCA

No suggestion of any significant disease.

ECA

Suggestion of mild disease.

ICA

Suggestion of total occlusion of ICA

Right :

CCA

No suggestion of any significant disease.

ECA

Suggestion of moderate disease.

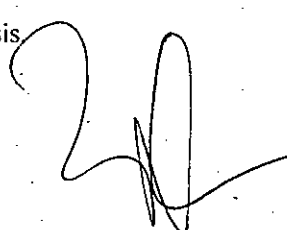
ICA

Mixed plaque with high grade stenosis

Suggestion:

Significant Carotid Artery disease.


Dr. Zia ul Sabah
P.G Cardiology,
PIMS, Islamabad.


Dr. Shahid Nawaz Malik
Associate Professor of Cardiology/
Interventional Consultant Cardiologist &
Director of Interventional Cardiology Deptt.
PIMS Islamabad

Pakistan Institute of Medical Sciences

Department of Chemical Pathology

13/06/2009

Patient Control #: P-06/09-17490

Receipt #: *****

Patient Name: YARD ABDULLAH

Age: 70 Yr(s)

Sex: Male

Sample date: Jun 12 2009 11:49PM

OPD: Cardiology OPD #: 263/09/06/01339

Specimen: Serum

Order #: 06/09-09409

Lab #: 06/09-09409

| Test Name | Conventional System | | System International (SI) | | |
|------------|---------------------|-----------------|---------------------------|--------------|--------|
| | Result | Normal Range | Result | Normal Range | |
| Urea (S) | 28 | 13 - 43 mg/dL | 4.6 | 2.2 - 7.1 | mmol/L |
| Creatinine | 0.99 | 0.6 - 1.3 mg/dL | 87.5 | 53 - 114.9 | µmol/L |

Pathologist Comments

Please correlate with clinical data and other investigations.

Sample is available for seven days. Please call undersigned for result re-check if required.

wt 85
BS 182/90

Dr. Haroon Khan
Consultant Chemical Pathologist
Ph: 9261170 Ext2374,2244

Reporting date 13/06/2009 02:06:53 AM

آپ کا پشیمت کنٹرول بر ہے۔ یہ نمبر شہال کو رکھیں اور ہمیشہ ہر ہسپتال آنے پر اپنے ساتھ لائیں۔ P-06/09-17490

LMIS - A CRM Product

BEFORE THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 564/2016

FAZAL KHALIQ.....(Appellant)

Versus

Inspector General Of Police And Others.....(Respondents)

APPLICATION FOR CORRECTION OF DISMISSAL FROM
SERVICE ORDER DATED 21.02.2009 INSTEAD OF ORDER
DATED 20.08.2010 IN PRAYER CLAUSE AS WELL AS PARA
NO. 5 OF THE FACTS IN APPEAL

Respectfully sheweth:-

1. That the above captioned appeal is pending before this hon'ble tribunal, duly fixed for today.
2. That inadvertently in prayer clause as well as in para No. 5 of the facts of the appeal, dismissal from service order date has wrongly been mentioned as 20.08.2010 instead of correct date 21.02.2009.
3. That for the interest of justice and proper adjudication on merits as well as keeping record straight, it needs correction at this stage while there is no hurdle in law for the same.

As such, on acceptance of the instant application the
aforementioned date may kindly be corrected in appeal.


APPELLANT


FAZAL KHALIQ

AFFIDAVIT:

It is stated on oath that the contents of this application are true and
correct to the best of my knowledge and belief.

ATTESTED


UMAR SADIQ Advocate,
OATH COMMISSIONER
Distt: Courts Swat.

No. 321 Date 04-04-18

DEPONENT


FAZAL KHALIQ

BEFORE THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 564/2016

FAZAL KHALIQ.....(Appellant)

Versus

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APPELLANT


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ATTESTED

UMAR SADIQ Advocate,
OATH COMMISSIONER
Distt: Courts Swat.
No. 329 Date 04-04-18

DEPONENT


FAZAL KHALIQ

BEFORE THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 564/2016

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Versus

Inspector General Of Police And Others.....(Respondents)

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OATH COMMISSIONER
Distt: Courts Swat.

No. 321 Date 04-04-18

DEPONENT



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correct to the best of my knowledge and belief.

ATTESTED

UMAR SADIQ Advocate,
OATH COMMISSIONER
Distt: Courts Swat.

No. 321 Date 04-04-18

DEPONENT


FAZAL KHALIQ

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No 1391 /ST

Dated 11 /07/2018

To

The Inspector General of Police,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: ORDER/JUDGEMENT IN APPEAL NO. 564/2016, MR. FAZAL KHALIQ.

I am directed to forward herewith a certified copy of Judgment/Order dated 05/07/2018 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

ڈسٹرکٹ بار ایسوسی ایشن

تیمرگرہ دیر لونیئر



ایڈویکیٹ بار کونسل نمبر:

BC-10-0439

2797

بعدالت جناب سرس ٹریبونل ضلع تختونخواہ کی ایکٹو کوٹ منسورہ سوات

فضل خالق بنام ۱۹۲ ضلع تختونخواہ

دعویٰ اپیل انگریزی اور خواہت: سرس اوپل منجانب: اسپلڈنٹ

مقدمہ علت نمبر: مورخہ: جرم: تھانہ:

باعث تحریر انکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ

آن مقام عدالت عالیہ منگورہ بیچ/تیمرگرہ/چکدرہ العل قلعہ/شرباغ کیلئے سجاد رحمان ایڈویکیٹ کو وکیل/وکلاء مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقررات و فیصلہ برحلف دینے، جواب دعویٰ، اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخلہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف وصول کرنے کا حقدار ہوگا کوئی تاریخ پیشی مقام دور یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں لہذا وکالت نامہ لکھ دیا تاکہ سند ہے۔

المرقوم: ۵۷ نومبر ۲۰۱۷

العبد العبد العبد العبد العبد

فضل خالق اسپلڈنٹ

مقام: عدالت عالیہ منگورہ بیچ/تیمرگرہ/چکدرہ العل قلعہ/شرباغ کیلئے منظور ہے۔

ایڈویکیٹ/دستخط:

رابطہ نمبر: 777737



نوٹ: فوٹوکاپی ناقابل قبول ہوگی